

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

Amphenol Corporation and Outdoor  
Wireless Networks, LLC,

Plaintiffs,

V.

Rosenberger Technology (Kunshan) Co. Ltd.,` Rosenberger Asia Pacific Electronic Co., Ltd., Rosenberger Technology LLC, Rosenberger USA Corp., Rosenberger North America Pennsauken, Inc., Rosenberger Site Solutions, LLC, Rosenberger Hochfrequenztechnik GmbH & Co. KG, Northwest Instrument, Inc., and CellMax Technologies AB

Defendants.

) Civil Action No. 19-cv-15962-JXN-  
) LDW

**CONSOLIDATED INDEX IN  
SUPPORT OF THE MOTION TO  
SEAL PLAINTIFFS' JUNE 4,  
2025 LETTER TO THE COURT  
(DKT. 632)**

**I. Plaintiffs' June 4, 2025 Letter to the Court (Dkt. 632)**

<b>Document</b>	<b>Basis for Sealing</b>	<b>Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted</b>	<b>Why a Less Restrictive Alternative to the Relief Sought is Not Available</b>	<b>Party in Opposition to Sealing, if any, and Basis</b>
Plaintiffs' Letter Seeking leave to File Sanctions Motion (Dkt. 632 at 1)	These portions of Plaintiffs' June 4, 2025 Letter include information that has been marked as Attorneys' Eyes Only and/or Confidential under the Discovery Confidentiality Order (Dkt. 22), including Interrogatory Requests, Requests for Production, responses to Requests for Production and Interrogatories, deposition transcripts, and confidential and non-public information about Defendants' business. (Yu Decl., ¶ 3).	Possible injury and prejudice to Defendants' competitive standing in the base station antenna marketplace. Disclosure of this information would also cause clearly defined and serious injury to Defendants because it would reveal discovery information that has been designated Attorneys' Eyes Only and/or Confidential under the Discovery Confidentiality	Redacted version of Plaintiffs' June 4, 2025 Letter that may be filed publicly.	Plaintiffs do not object.

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
	In addition, portions of Plaintiffs' June 4, 2025 Letter were previously sealed pursuant to the Court's Sealing Order, Dkt. 293, granting Joint Motion to Seal Motion for Sanctions Pursuant to L. Civ. R. 5.3, Dkt. 283; <i>see also</i> Dkt. 283-5.	Order (Dkt. 22). (Yu Decl., ¶ 3).		
Plaintiffs' Letter Seeking leave to File Sanctions Motion (Dkt. 632 at 2	These portions of Plaintiffs' June 4, 2025 Letter include information that has been marked as Attorneys' Eyes Only and/or Confidential under the Discovery Confidentiality Order (Dkt. 22), including the June 20, 2024 deposition of Shang	Possible injury and prejudice to Defendants' competitive standing in the base station antenna marketplace. Disclosure of this information would also cause clearly defined and	Redacted version of Plaintiffs' June 4, 2025 Letter that may be filed publicly.	Plaintiffs do not object.

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	<p>Hong, expert reports, Interrogatory Requests, Requests for Production, responses to Requests for Production and Interrogatories, and confidential and non-public information about Defendants' business. (Yu Decl., ¶ 3).</p> <p>In addition, portions of Plaintiffs' June 4, 2025 Letter were previously sealed pursuant to (i) the Court's Sealing Order, Dkt. 584, granting Joint Motion to Seal Joint Submission Regarding Plaintiffs' Discovery Issue, Dkt.</p>	<p>serious injury to Defendants because it would reveal discovery information that has been designated Attorneys' Eyes Only and/or Confidential under the Discovery Confidentiality Order (Dkt. 22). (Yu Decl., ¶ 3).</p>		

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	579, and (ii) the Court's Sealing Order, Dkt. 585, granting Joint Motion to Seal January 25, 2024 Hearing Tr., Dkt. 576; <i>see also</i> Dkt. 576-4; 579-4; 586; 588.			